



# City of Temecula

## Public Works Department

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May 10, 2006

### Mr. Jonathan Nadler

Southern California Association of Governments (SCAG)  
Transportation Conformity Working Group  
818 W. Seventh Street, 12<sup>th</sup> Floor (Main Building)  
Los Angeles, CA 90017

**Subject: I-15/SR-79S Interchange Project (EA 08224-432300)-Particulate Matter PM<sub>2.5</sub> Conformity**

Dear Mr. Nadler:

The City of Temecula (City), in partnership with the California Department of Transportation (Caltrans) and the Federal Highway Administration (FHWA), proposes to construct improvements to the existing I-15/SR-79 South Interchange in the City of Temecula. The proposed interchange improvements include:

1. Southbound I-15 Ramps: The existing southbound exit ramps will be eliminated and replaced with a new far side exit loop ramp which is paired with a new southbound entrance ramp which will intersect SR-79 South opposite the existing Front Street intersection. The southbound exit will be reconfigured to provide a two (2) lane exit with 1,300 feet of auxiliary lane preceding the exit. A new bridge structure will be constructed over SR-79 South to accommodate the new southbound exit ramp configuration.
2. Northbound I-15 Ramps: The northbound exit ramp will be widened to provide four (4) lanes at the ramp intersection. The northbound entrance ramp will be widened to provide three (3) lanes at the ramp intersection and a three lane ramp meter entrance to the I-15.
3. SR-79 South: Improvements include elimination of the curb and gutter and parkway on the south side of SR-79 South through the interchange area and restriping to provide three (3) through lanes and two (2) left turn lanes in each direction of travel.

The project was initiated by the City of Temecula to mitigate existing operational deficiencies at the interchange and accommodate local and regional traffic increases that will result from the future development of the City of Temecula's General Plan Land Use Element and other regional development.

On March 10, 2006, the U.S. Environmental Protection Agency (EPA) published a final rule that establishes the transportation conformity criteria and procedures for determining which transportation projects must be analyzed for local air quality impacts in PM<sub>2.5</sub> and PM<sub>10</sub> nonattainment and maintenance areas (71 Federal Register [FR] 12458). Transportation conformity is required under Clean Air Act section 176(c) 42 United States Code (U.S.C.) 7506(c) to ensure that federally supported highway and transit project activities are consistent with



("conform to") the purpose of the state quality implementation plan (SIP). EPA's transportation conformity rule (40 Code of Federal Regulations [CFR] 51.390 and Part 93) establishes the criteria and procedures for determining whether transportation activities conform to the SIP. Clean Air Act section 176(c)(1)(B) is the statutory criterion that must be met by all projects in nonattainment and maintenance areas that are subject to transportation conformity. Section 176(c)(1)(B) states that federally-supported transportation projects must not "cause or contribute to any new violation of any standard in any area; increase the frequency or severity of any existing violation of any standard in any area; or delay timely attainment of any standard or any required interim emission reductions or other milestones in any area."

To meet statutory requirements, the March 10, 2006 final rule requires PM<sub>2.5</sub> and PM<sub>10</sub> hot-spot analyses to be performed for projects of air quality concern. Qualitative hot-spot analyses would be done for these projects before appropriate methods and modeling guidance are available and quantitative PM<sub>2.5</sub> and PM<sub>10</sub> hot-spot analyses are required under 40 CFR 93.123(b)(4). In addition, through the final rule, EPA determined that projects not identified in 40 CFR 93.123(b)(1) as projects of air quality concern have also met statutory requirements without any further hot-spot analyses (40 CFR 93.116(a)). The final rule defines the projects of air quality concern that require a PM<sub>2.5</sub> and PM<sub>10</sub> hot-spot analysis in 40 CFR 93.123(b)(1) as:<sup>1</sup>

- (i) New or expanded highway projects that have a significant number of or significant increase in diesel vehicles;
- (ii) Projects affecting intersections that are at Level-of-Service D, E, or F with a significant number of diesel vehicles, or those that will change to Level-of-Service D, E, or F because of increased traffic volumes from a significant number of diesel vehicles related to the project;
- (iii) New bus and rail terminals and transfer points that have a significant number of diesel vehicles congregating at a single location;
- (iv) Expanded bus and rail terminals and transfer points that significantly increase the number of diesel vehicles congregating at a single location; and
- (v) Projects in or affecting locations, areas, or categories of sites which are identified in the PM<sub>2.5</sub> or PM<sub>10</sub> applicable implementation plan or implementation plan submission, as appropriate, as sites of violation or possible violation.

Conformity determinations require the analysis of direct and indirect emissions associated with the proposed project and compare them to the without project condition. If the total of direct and indirect emissions from the project reaches or exceeds regionally significant thresholds, the Lead Agency must perform a conformity determination to demonstrate the positive conformity of the federal action.

The project is programmed within the Southern California Association of Governments (SCAG) adopted 2004 Regional Transportation Improvement Program (RTIP) and is described as follows: #RIV62031: At I-15/SR-79 South IC - IC modification/reconfigure ramps including SB ramps removal, construct new SB exit/entry ramps (2 lns), & Front St realign/channelization improvements. Additionally, the project is programmed within the

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<sup>1</sup> U.S. Environmental Protection Agency and Federal Highway Administration, *Transportation Conformity Guidance for Qualitative Hot-Spot Analyses in PM<sub>10</sub> and PM<sub>2.5</sub> Nonattainment and Maintenance Areas*, (PM<sub>10</sub> Protocol), March 2006, Appendix A.

SCAG adopted 2004 Regional Transportation Plan (RTP). Therefore, the proposed project is in conformance with the SIP.

The proposed improvements will improve local circulation and access to predominantly residential areas in the City. Without implementation of the proposed improvements, two interchange intersections are forecast to operate at deficient LOS levels, according to Caltrans acceptable performance criteria of LOS E or better. Within the interchange, SR-79S is currently an east-west facility which provides (2) through lanes in each direction of travel and three left-turn lanes. It should be noted that SR-79 South does not currently nor is forecast to experience traffic volumes in excess of 125,000 average daily trips (ADT). Additionally, the total volume of heavy truck and diesel traffic is expected to be well below 8 percent of the total ADT as the City of Temecula is zoned for limited industrial/manufacturing uses and the area served by SR-79 South is a mix of residential and public/institutional zoning designations.

Based upon the information provided above, the project is not expected to introduce significant amounts of diesel truck traffic and is not considered a project of significant concern per the definition contained within 40 CFR 93.123(b)(1). Thus, a less than significant impact with respect to  $PM_{2.5}$  and  $PM_{10}$  would occur

The project Air Quality Study has been reviewed and approved by Caltrans pending receipt of a preliminary proposal relative to the treatment of the new  $PM_{2.5}$  requirement. The City respectfully requests SCAG consideration and acceptance of this letter as formal validation of the project's insignificant contribution of  $PM_{2.5}$ . The Air Quality Study will be revised prior to public circulation of the Draft Environmental Document and will include a statements noted above regarding  $PM_{2.5}$ .

Sincerely,

A handwritten signature in black ink, appearing to read 'W. Hughes', written over the word 'Sincerely,'.

William G. Hughes  
Director of Public Works/City Engineer